

LA PENNA & RADOWITZ, P.C.
636 Chestnut Street
Union, New Jersey 07036
(908) 687-2333
BRUCE W. RADOWITZ, ESQ.
Attorney for Debtor

In the matter of:

Donald Wrege and Janice Wrege

Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

Case No:05-24404/NLW

Chapter 13

**NOTICE OF MOTION FOR AN ORDER TO REINSTATE THE
AUTOMATIC STAY**

TO:

All Interested Parties

DEAR LADIES AND GENTLEMEN:

PLEASE TAKE NOTICE that the Debtor(s), Donald Wrege and Janice Wrege by their counsel, La Penna & Radowitz, P.C., will move before the United States Bankruptcy Court Martin Luther King Jr. Federal Building, 50 Walnut Street Newark NJ on _____ or at a time to be set by the Court for an Order to Reinstate the Automatic Stay as to Real Property.

PLEASE TAKE FURTHER NOTICE that the Debtors will rely upon the application and proposed form of order annexed hereto.

LA PENNA & RADOWITZ, P.C.

By: /s/ Bruce W. Radowitz